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10 COREPHOTONICS, LTD.

11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14

15 COREPHOTONICS, LTD.

16 Plaintiff,

17 vs.

18 APPLE INC.

19 Defendant.

20 Case No. 3:17-cv-06457-JD (Lead)
Case No. 5:18-cv-02555-JD

21 **DECLARATION OF BRIAN D. LEDAHL**
22 **IN SUPPORT OF PLAINTIFF**
23 **COREPHOTONICS, LTD.'S**
24 **ADMINISTRATIVE MOTION TO FILE**
25 **UNDER SEAL**

RUSS, AUGUST & KABAT

1 I, Brian D. Ledahl, state as follows:

2 1. I am a member of the State Bar of California and a partner at the firm of Russ,
3 August & Kabat, counsel for Plaintiff Corephotonics, Ltd. in the above captioned action. I have
4 personal knowledge of the facts set forth herein, and if called upon to testify, could and would
5 testify competently thereto.

6 2. I submit this declaration in support of Corephotonics' Administrative Motion to
7 File Under Seal (1) Portions of Corephotonics' Opposition to Apple's Motion to Dismiss for Lack
8 of Standing; and (2) Portions of Declaration of Eran Kali in Support of Corephotonics' Opposition,
9 which contain information that Corephotonics considers to be "Highly Confidential" -- Attorneys'
10 Eyes Only" under the Protective Order Regarding the Disclosure and Use of Discovery Materials
11 in this case (Dkt. 77). Specifically, the information that Corephotonics seeks the Court's
12 permission to file under seal relates to Corephotonics patent licensing activity and the confidential
13 terms of certain licenses, and also to the confidential terms of certain corporate transactions,
14 including transactions for the acquisition of shares of Corephotonics. The information sought to
15 be sealed contains competitively sensitive confidential information of Corephotonics.

16 I declare under penalty of perjury under the laws of the United States the foregoing is true
17 and correct.

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20 Executed on January 15, 2024 in Lexington, Massachusetts.

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22 By: /s/ Brian D. Ledahl
23 Brian D. Ledahl
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